

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

*IN RE: ANEW Skincare Creams and Products
Marketing and Sales Practices Litigation*

Case No.: 1:13-cv-00150-JPO-KNF

Judge J. Paul Oetken

**DECLARATION OF MONIQUE QUINTANA IN SUPPORT OF PLAINTIFFS'
REPLY IN FURTHER SUPPORT FOR CLASS CERTIFICATION, APPOINTMENT
OF CLASS REPRESENTATIVES, AND APPOINTMENT OF CLASS COUNSEL**

I, Monique Quintana, under penalty of perjury and on oath, duly declare and state as follows:

1. I am over the age of 18 years and I have personal knowledge of the facts contained in this Declaration and can competently testify to the statements contained herein. This declaration is submitted in support of Plaintiffs' Reply in Further Support for Class Certification in the above captioned matter. Unless otherwise stated, I could testify competently to them if called upon to do so.

2. I am an individual and representative Plaintiff in this case. Through my attorneys, I have brought claims on behalf of other persons who bought the Avon products at issue.

3. I am a resident and citizen of San Diego County in the State of California. As I testified during my May 20, 2014 deposition, I purchased Avon's Clinical Advanced Wrinkle Corrector, Reversalist Night Renewal Cream, and Reversalist Renewal Serum on various occasions between 2010 and 2012 from my Avon Sales representative, Rosa Aguilar.

4. Also, as stated in my deposition, my purchases were made where I work at a self-storage facility, where Ms. Aguilar would also pick up her Avon products.

5. I have read the Declaration of Rosa Aguilar, dated June 30, 2014 that

was filed in support of Avon's opposition to Plaintiffs' Motion for Class Certification. Several statements in Ms. Aguilar's declaration are not accurate.

6. Ms. Aguilar's statement that she believes she first met me on or about February 2013 is false. In fact, as I testified in my deposition, I met Ms. Aguilar back in 2011 when I began purchasing Avon products from her.

7. Ms. Aguilar's statement that she never discussed any Avon product with me is false. In fact, as I testified in detail, Ms. Aguilar and I spoke on many occasions about Avon products, and about which Avon products would be best for me.

8. Ms. Aguilar's statement that she never sold me any Avon products is false. In fact, as I testified in detail, I purchased several different Avon products from Ms. Aguilar on several different occasions.

9. I believe the reason Ms. Aguilar provided false information to Avon is because she does not want Avon to know that she picks up her Avon products from the self-storage facility where I work in San Diego, California and transports those products back to Mexico where she lives and sells those Avon products.

10. As class representative, I have actively participated in this litigation, including reviewing the complaint, responding to discovery, having my deposition taken in Los Angeles, California, and consulting with my attorneys. I have also made myself available to my attorneys and will continue to do so for as long as this case remains active. I will participate in discovery, and appear at trial as necessary.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on March 20, 2015.


Monique Quintana